



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

FEB 28 2013

Mr. Stanley W. Posey
Manager, Environmental Affairs
White Springs Agricultural Chemicals, Inc.
d/b/a PCS Phosphate- White Springs
P.O. Box 300
15843 SE 78th Street
White Springs, Florida 32096

SUBJECT: Approval of the October 9, 2012 Revised Work Plan Schedules for the April 26, 2012 "Work Plan and Schedule for Construction of a New Lined Phosphogypsum Stack, Suwannee River Chemical Complex" and the June 30, 2011 "Work Plan and Schedule for Closure of the Dorr-Oliver Cooling Pond, Suwannee River Chemical Complex" White Springs Agricultural Chemicals, Inc. d/b/a PCS Phosphate - White Springs Docket No. RCRA-04-2010-4250

Dear Mr. Posey:

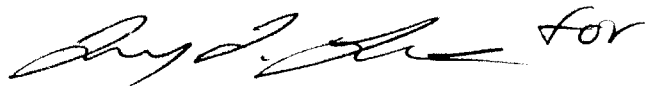
The U.S. Environmental Protection Agency in coordination with the Florida Department of Environmental Protection (FDEP) has reviewed the October 9, 2012 PCS Phosphate - White Springs (PCS) submittal. The subject document includes revised schedules for the Closure of the Dorr-Oliver Cooling Pond and Construction of a New Lined Phosphogypsum Stack at the Suwannee River Chemical Complex. The Work Plan for the Closure of the Dorr-Oliver Cooling Pond and Construction of a New Lined Phosphogypsum Stack at the Suwannee River Chemical Complex are part of the EPA approved "Preferred Alternatives Plan." The Preferred Alternatives Plan was submitted to the EPA pursuant the RCRA Section 7003 Consent Order (Order), Docket No. RCRA-04-2010-4250, and approved by the EPA in coordination with the FDEP on May 2, 2011.

The EPA hereby approves PCS's proposed revised schedules in the October 9, 2012 submittal (enclosed). PCS is reminded that all work shall be performed in accordance with the timeframes proposed within the revised schedules of the approved Work Plans. Pursuant to Paragraph 96 of the Order, upon approval, the revised schedules of the Work Plans are incorporated into the Order, and as such, the timeframes set forth therein are enforceable. Any necessary modifications to the closure schedule, including those caused by the delaying factors referenced on Page 3 of the Work Plans (e.g. additional studies or investigations), must be submitted to the EPA and the FDEP in accordance with Paragraph 98 of the Order. Furthermore, Force Majeure requirements found in Section XIX of the Order also apply to the Work Plans.

Please be reminded, pursuant to Paragraph 83(d) of the Order, all proposed work plans for future projects shall be submitted six (6) months prior to the scheduled start date of the project at issue.

If you have any questions concerning this matter, please contact Joan Redleaf Durbin at (404) 562-9544 or via email at redleaf-durbin.joan@epa.gov, or Alan A. Annicella, of my staff, at (404) 562-8610 or via email at annicella.alan@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "César A. Zapata", followed by the word "for" in a cursive script.

César A. Zapata
Chief, RCRA and OPA Enforcement and
Compliance Branch
RCRA Division

Enclosed – PCS letter of October 9, 2012

cc: Tim Bahr – FDEP (via email)
John Coates – FDEP (via email)
Ashwin Patel – FDEP (via email)
Gregory M. Hitz – Lampl Herbert Consultants, Inc. (via email)